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Attorneys for Dr. Arnold Leong,  
Alleged General Partner of Putative Alleged Debtor

**UNITED STATES BANKRUPTCY COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

In re:  
LEONG PARTNERSHIP,  
Alleged Debtor.

Case No.: 16-42363-CN  
Chapter 11

**DR. LEONG'S LIMITED OPPOSITION  
TO REQUEST FOR ADDITIONAL TIME  
FILED BY PETITIONING CREDITORS**

Hearing Date

Date: February 27, 2017  
Time: 10:00 am

Dr. Arnold Leong ("Leong"), the alleged general partner of the alleged Leong Partnership ("Alleged Debtor"), submits this limited opposition to the *Request* filed by Warren Havens and Polaris PNT PBC ("Petitioning Creditors") on February 8, 2017 [Docket 111]. In the Request, Petitioning Creditors request "45 days from the date of the grant to secure replacement counsel, and in that time, to toll all deadlines to respond to the pending motions and requests of Arnold Leong, and other matters involved in this case." The only matter before this Court at the present time is the *Motion by Arnold Leong for Judgment against Petitioners for Attorney's Fees and Costs Pursuant to Bankruptcy Code Section 303(I)* [Docket No. 104] (the "Fee Motion"). The hearing on the Fee Motion has recently been continued by the Court to March 9, 2017 at 10:00 AM.

Leong does not oppose a one-time brief extension of time to allow Petitioning Creditors to secure new counsel so that Petitioning Creditors may have 45 days from the date of the Request to

1 file an opposition to the Fee Motion. There is no reason why Petitioning Creditors need 45 days  
2 from the date the Court approves their Request in order to secure counsel and file opposition papers.

3 As the Court may recall in the various briefs filed by Leong, Mr. Havens has hired and fired  
4 more than ten sets of lawyers in the underlying state court action entitled, *Arnold Leong v. Warren*  
5 *Havens et al.*, pending in the Alameda Superior Court (Case No. 2002-070640), each time using his  
6 lack of counsel as a basis to delay resolution of this long running dispute with Leong.<sup>1</sup> Nonetheless,  
7 recognizing that this Court may lack familiarity with the vexatious nature of Mr. Havens' litigation  
8 tactics, Leong does not oppose providing Petitioning Creditors with a brief extension of time so that  
9 Mr. Havens may secure new counsel and respond to the Fee Motion within 45 days from the date of  
10 the filing of the Request. Leong therefore consents to a briefing schedule that allows Petitioning  
11 Creditors to file their opposition to the Fee Motion no later than the week of March 27, 2017 and  
12 allows Leong to file a reply seven days thereafter. Leong requests that no further extensions be  
13 granted by this Court.

14  
15 Respectfully Submitted,

16 Dated: February 23, 2017

PACHULSKI STANG ZIEHL & JONES LLP

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18 By: /s/ Miriam Manning  
Jeremy V. Richards  
Miriam Manning

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20 Attorneys for Dr. Arnold Leong  
21 Alleged General Partner of Putative Alleged  
22 Debtor

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28 <sup>1</sup> See, para 2, *Declaration of Richard W. Osman In Support of Motion of Dr. Arnold Leong to Dismiss Involuntary*  
*Petition* (Docket No. 14); Page 2 of *Motion of Dr. Leong to Dismiss Involuntary Petition* (Docket No. 14).